

JUL 14 2000

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**In the Matter of**

**Implementation of the Satellite Home  
Viewer Improvement Act of 1999**

**Broadcast Signal Carriage Issues**

**To: The Commission**

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**CS Docket No. 00-96**

**COMMENTS  
OF THE**

**NATIONAL RURAL TELECOMMUNICATIONS COOPERATIVE**

**Steven T. Berman, Senior Vice President  
Business Affairs and General Counsel  
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**Dated: July 14, 2000**

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## **COMMENTS**

Pursuant to Sections 1.415 and 1.419 of the Rules and Regulations of the Federal Communications Commission (“FCC” or “Commission”), 47 C.F.R. §§ 1.415 and 1.419, the National Rural Telecommunications Cooperative (“NRTC”), by its attorneys, hereby submits these Comments in the above-captioned proceeding. The proposed satellite “must carry” requirements (“you carry one signal, you must carry them all”) may work well in urban areas where local-into-local channels are offered by Echostar and DIRECTV. In rural America, however, there is not enough satellite capacity to provide all local signals. Nor in many cases is there a large enough subscriber base to justify it economically. “Must carry” will mean “no carry” in rural America.

## **BACKGROUND**

NRTC is a not-for-profit cooperative association comprised of 550 rural electric cooperatives, 279 rural telephone systems and several non-member affiliate organizations located throughout 48 states. NRTC’s mission is to assist its members and affiliates in meeting the telecommunications needs of rural American consumers. Through the use of satellite distribution technology, NRTC is committed to extending the benefits of information, education and entertainment programming to rural America, on an affordable basis and in an easy and convenient manner, just as those services are available in more populated areas. In short, NRTC seeks to ensure that rural Americans receive the same benefits of the modern information age as their urban counterparts.

In 1992, NRTC entered into an agreement with Hughes Communications Galaxy, Inc., the predecessor in interest to DIRECTV, Inc., to launch the first high-powered DBS service offered in the United States. NRTC members and affiliates invested more than \$100 million to capitalize DIRECTV Inc.'s satellite business, and in return received distribution rights for DIRECTV programming ("DIRECTV") in specific regions of the country. At present, NRTC provides DIRECTV to more than 1.5 million households using digital DBS technology.

Most of NRTC's subscribers are located in rural areas. Many do not have access to cable services. Moreover, many are unable to receive acceptable pictures over-the-air from their local broadcast network affiliates.

During the past year, NRTC has sought legislation in Congress authorizing federal loan guarantees to provide local-into-local satellite service to rural Americans. Congress has expressed a strong interest in ensuring that local television signals are available in unserved and underserved markets, and is now close to passing legislation authorizing loan guarantees of up to \$1 billion for rural local service.<sup>1</sup>

**THE SATELLITE MUST CARRY RULES WILL PREVENT  
RURAL AMERICANS FROM RECEIVING ANY LOCAL  
SATELLITE SERVICE.**

In this proceeding, the Commission seeks comment on the appropriate rules to implement Section 338(a)(1) of the Communications Act, adopted as part of the Satellite Home Viewer Improvement Act of 1999 ("SHVIA"),<sup>2</sup> which provides that after

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<sup>1</sup> The Senate version of the rural local funding bill under consideration is *Launching Our Communities' Access to Local Television Act of 2000*, S.2097.ES.

<sup>2</sup> Pub. Law 106-113, 113 Stat. 1501, Appendix I (1999).

December 31, 2001:

each satellite carrier providing [television broadcast signals under the compulsory copyright licensing system] to subscribers located within the local market of a television broadcast station of a primary transmission made by that station shall carry upon request the signals of all television broadcast stations located within that local market, subject to section 325(b) [retransmission consent requirement].<sup>3</sup>

This legislation requires satellite carriers, by January 1, 2002, to carry upon request all local broadcast stations' signals in local markets in which at least one broadcast station signal is carried pursuant to Section 122 of title 17, United States Code. The SHVIA requires the Commission to issue rules implementing this carriage requirement by November 29, 2000.

DIRECTV and EchoStar, the only two companies offering high-powered Direct Broadcast Satellite service nationwide, offer local-into-local service only in the top metropolitan areas. (See Attachment: "Local Satellite Service by DMA Market by Rank.") DIRECTV has announced its intention to provide local service to 37 out of a total of 210 markets. While providing many of the same local signals in many of the same markets served by DIRECTV, EchoStar also has announced that it will serve an additional 7 markets not served by DIRECTV. In combination, DIRECTV and EchoStar have announced plans to serve only 44 markets, or less than two-thirds of the TV Homes. Twenty states will receive no local-into-local service originating from within their states.

Even assuming that DIRECTV and EchoStar were to expand their local service to cover 50 % more of the DMAs than they have announced, which is highly unlikely, their

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<sup>3</sup>47 U.S.C. §338(a)(1).

local service offerings would still cease to exist at Market #65. Under this unrealistically optimistic scenario, at least twenty-five million TV homes in Markets 65 and beyond, which includes virtually all of rural America and much in the middle, will remain unserved. Up to one-third of the states -- Alaska, Delaware, Hawaii, Idaho, Iowa, Maine, Mississippi, Montana, Nebraska, New Hampshire, New Jersey, North Dakota, South Carolina, South Dakota, Vermont and Wyoming -- will be excluded from receiving any local satellite service originating from within their states.

The satellite “must carry” rules will compound this problem. Although NRTC does not question the underlying purpose of the must carry rules, these satellite carriers will not provide any local signals in lower population, lower-profit markets if they are statutorily required to carry all signals in these markets. There is not enough satellite capacity available, nor is there a large enough subscriber base. For rural America, “must carry” will mean “no carry.”

This disenfranchisement of rural America comes at a particularly inopportune time. Recent court decisions applying restrictions contained in the copyright laws have caused many rural consumers to lose access to their distant network signals at the same time they are being denied access to local signals by satellite.<sup>4</sup> The loss of distant network signals in combination with the unavailability of local signals will severely restrict programming choices in rural America.

As a matter of national telecommunications policy, this expanding divide between information “haves and have nots” should be of serious concern to the Commission.

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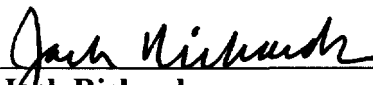
<sup>4</sup> See, NRTC Emergency Petition for Rulemaking, *In the Matter of Definition of Over-the-Air Signal of Grade B Intensity for Purposes of the Satellite Home Viewer Act*, Rm. No. 9335, pp. ii, 9 (July 8, 1998); see e.g., *CBS Inc., et al. v. PrimeTime24 Joint Venture*, 9 F.Supp.2d 1333 (S.D. FL. May 13, 1998).

Cut off from local broadcast signals, rural Americans living outside the top television markets will be unable to receive local community information that Americans in more populated parts of the country take for granted. Critical information regarding local news, weather and other emergency conditions will be unavailable. Advance warnings of hurricanes, tornadoes, snowstorms and the like will be unavailable. Up-to-the-minute information necessary to protect property and save lives -- the type of information already available in urban America from a variety of sources -- will be unavailable throughout rural America.

## **CONCLUSION**

The Commission must ensure that rural Americans are not left behind their urban counterparts in the information age. Implementation of the satellite "must carry" rules will only exacerbate the problem.

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**ATTACHMENT: "Local Satellite Service by DMA Market by Rank."**

**Dated: July 14, 2000**

## CERTIFICATE OF SERVICE

I, Cassandra L. Hall, do hereby certify that copies of the foregoing **Comments of the National Rural Telecommunications Cooperative** were sent, via hand delivery, this 14th day of July, 2000, to the following:

Honorable William E. Kennard  
Chairman  
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Cassandra L. Hall

\*Diskette copy included



# Local Satellite Service by DMA Market by Rank

MKT #	Launched/Announced Market	DMA Name	State	Total 1999 TV HH	Commercial Stations***	Public/Ed Stations***	Total Stations	Repeated Stations***	Net Stations
1	DTV/ECHO Launched	New York	NY	6,874,990	16	1	17	1	16
2	DTV/ECHO Launched	Los Angeles	CA	5,234,690	19	1	20	0	20
3	DTV/ECHO Launched	Chicago	IL	3,204,710	13	1	14	0	14
4	DTV/ECHO Launched	Philadelphia	PA	2,670,710	14	1	15	0	15
5	DTV/ECHO Launched	San Francisco-Oak-San Jose	CA	2,423,120	17	1	18	0	18
6	DTV/ECHO Launched	Boston	MA	2,210,580	16	1	17	2	15
7	DTV/ECHO Launched	Dallas-Ft. Worth	TX	2,018,120	15	1	16	0	16
8	DTV/ECHO Launched	Washington, DC,Hagerstown	DC/MD/VA	1,999,870	11	1	12	0	12
9	DTV/ECHO Launched	Detroit	MI	1,855,500	8	1	9	0	9
10	DTV/ECHO Launched	Atlanta	GA	1,774,720	10	1	11	0	11
11	DTV/ECHO Launched	Houston	TX	1,712,060	13	1	14	0	14
12	DTV/ECHO Launched	Seattle-Tacoma	WA	1,591,100	9	1	10	0	10
13	DTV/ECHO Launched	Tampa-St. Petersburg	FL	1,485,980	12	1	13	0	13
14	DTV/ECHO Launched	Minneapolis-St. Paul	MN	1,481,050	12	1	13	4	9
15	DTV/ECHO Launched	Cleveland	OH	1,479,020	12	1	13	0	13
16	DTV/ECHO Launched	Miami-Ft. Lauderdale	FL	1,441,570	13	1	14	0	14
17	DTV/ECHO Launched	Phoenix	AZ	1,390,750	13	1	14	0	14
18	DTV/ECHO Launched	Denver	CO	1,268,230	15	1	16	3	13
19	DTV/ECHO Launched	Sacramnto-Stktn-Modesto	CA	1,159,820	9	1	10	0	10
20	DTV/ECHO Launched	Pittsburgh	PA	1,135,290	6	1	7	0	7
21	DTV/ECHO Launched	St. Louis	MO	1,114,370	7	1	8	0	8
22	DTV/ECHO Launched	Orlando-Daytona Bch-Melbrn	FL	1,101,920	12	1	13	0	13
23	DTV Announced (8/11)/Echo Launched	Portland, OR	OR	1,004,140	8	1	9	0	9
24	DTV Launched	Baltimore	MD	999,200	6	1	7	0	7
25	DTV/ECHO Launched	San Diego	CA	980,620	7	1	8	0	8
26	DTV Announced (7/28)/Echo Launched	Indianapolis	IN	963,320	10	1	11	1	10
27	ECHO Announced (TBD)	Hartford & New Haven	CT	915,940	8	1	9	0	9
28	DTV Announced (7/28)/Echo Launched	Charlotte	NC	880,570	8	1	9	0	9
29	DTV/ECHO Launched	Raleigh-Durham	NC	858,490	10	1	11	0	11
30	DTV Announced (9/13)/ECHO Launched	Nashville	TN	826,090	10	1	11	0	11
31	DTV Announced (TBD)/ECHO Launched	Kansas City	MO	820,580	8	1	9	0	9
32	DTV Announced (TBD)	Cincinnati	OH	820,000	5	1	6	0	6
33	DTV Announced (7/28)	Milwaukee	WI	815,640	9	1	10	0	10
34	DTV Announced (TBD)	Columbus	OH	757,860	6	1	7	0	7
35	DTV Launched	Greenvll-Spart-Ashevl-And	NC	732,490	8	1	9	1	8
36	DTV/ECHO Launched	Salt Lake City	UT	720,860	10	1	11	2	9
37	DTV Announced (TBD)	San Antonio	TX	684,730	8	1	9	0	9
38		Grand Rapids-Kalmzoo-B Crk	MI	671,320	8	1	9	0	9
39	DTV Announced (TBD)	Birmingham	AL	667,650	10	1	11	0	11
40	DTV Announced (9/20)	Memphis	TN	632,110	7	1	8	0	8
41	ECHO Announced (TBD)	New Orleans	LA	629,820	8	1	9	0	9
42		Norfolk-Portsmth-Newpt Nws	VA	629,100	7	1	8	0	8

# Local Satellite Service by DMA Market by Rank

MKT #	Launched/Announced Market	DMA Name	State	Total 1999 TV HH	Commercial Stations***	Public/Ed Stations***	Total Stations	Repeated Stations***	Net Stations
43	DTV Announced (TBD)	West Palm Beach-Ft. Pierce	FL	623,760	6	1	7	0	7
44		Buffalo	NY	621,460	7	1	8	0	8
45	ECHO Announced (TBD)	Oklahoma City	OK	600,240	8	1	9	0	9
46		Harrisburg-Lncstr-Leb-York	PA	599,930	6	1	7	0	7
47	DTV Announced (TBD)	Greensboro-H Point	NC	592,770	8	1	9	0	9
48		Louisville	KY	576,850	7	1	8	0	8
49	ECHO Announced (TBD)	Albuquerque-Santa Fe	NM	568,650	16	1	18	7	11
50		Providence-New Bedford	RI	565,230	4	1	5	0	5
51		Wilkes Barre-Scranton	PA	555,400	6	1	7	2	5
52	ECHO Announced (TBD)	Jacksonville, Brunswick	FL	540,450	7	1	8	0	8
53	ECHO Announced (TBD)	Las Vegas	NV	521,200	8	1	9	0	9
54		Fresno-Visalia	CA	511,050	10	1	11	0	11
55		Albany-Schenectady-Troy	NY	507,000	6	1	7	1	6
56		Dayton	OH	506,440	6	1	7	0	7
57		Little Rock-Pine Bluff	AR	488,000	7	1	8	0	8
58		Tulsa	OK	482,740	8	1	11	0	11
59		Charleston-Huntington	WV	481,410	5	1	6	0	6
60		Richmond-Petersburg	VA	474,610	5	1	6	0	6
61	DTV Announced (TBD)	Austin	TX	472,780	6	1	7	1	6
62		Mobile-Pensacola	AL/FL	471,920	9	1	10	0	10
63		Knoxville	TN	451,870	6	1	7	0	7
64		Flint-Saginaw-Bay City	MI	444,120	5	1	6	0	6
65		Wichita-Hutchinson Plus	KS	443,690	12	1	15	8	7
<b>TOTAL TOP 65 MARKETS</b>				<b>74,740,270</b>	<b>601</b>	<b>65</b>	<b>671</b>	<b>33</b>	<b>638</b>
<b>% TO OVERALL TOTAL</b>				<b>74.17%</b>	<b>50.00%</b>	<b>31.10%</b>	<b>47.12%</b>	<b>27.27%</b>	<b>48.96%</b>

66		Lexington	KY	416,200	6	1	10	0	10
67		Toledo	OH	411,450	4	1	5	0	5
68	ECHO Announced (TBD)	Roanoke-Lynchburg	VA	403,270	7	1	8	1	7
69		Green Bay-Appleton	WI	392,300	6	1	7	0	7
70		Des Moines-Ames	IA	387,850	4	1	5	0	5
71		Honolulu	HI	385,790	20	1	21	11	10
72		Tucson	AZ	380,900	6	1	7	0	7
73		Omaha	NE	373,320	5	1	6	0	6
74		Paducah-C Gird-Harbg	KY	370,900	8	1	9	1	8
75		Shreveport	LA	370,480	5	1	6	0	6
76		Syracuse	NY	369,680	5	1	6	0	6
77		Rochester, NY	NY	366,770	4	1	5	0	5
78		Spokane	WA	366,080	6	1	7	1	6
79		Springfield, MO	MO	363,500	4	1	5	0	5

# Local Satellite Service by DMA Market by Rank

MKT #	Launched/Announced Market	DMA Name	State	Total 1999 TV HH	Commercial Stations***	Public/Ed Stations***	Total Stations	Repeated Stations***	Net Stations
80		Portland-Auburn	NH	355,040	4	1	5	0	5
81		Ft. Myers/Naples	FL	343,550	6	1	7	0	7
82		Huntsville-Decatur, Flor	AL	342,460	6	1	7	0	7
83		Champaign&Sprngfld-Decatur	IL	341,990	8	1	9	3	6
84		Chattanooga	TN	327,310	6	1	7	0	7
85		Madison	WI	322,780	4	1	5	0	5
86		Columbia, SC	SC	317,740	4	1	5	0	5
87		South Bend-Elkhart	IN	314,920	4	1	5	0	5
88		Davenport-R Island - Moline	IA/IL	308,790	5	1	6	1	5
89		Jackson, MS	MS	305,830	5	1	6	1	5
90		Cedar Rapids-Waterloo&Dubq	MI	303,470	6	1	7	1	6
91		Burlington-Plattsburgh	VT/NY	295,480	5	1	6	1	5
92		Tri-Cities, TN-VA	TN/VA	293,150	5	1	6	0	6
93		Colorado Springs-Pueblo	CO	290,830	4	1	5	0	5
94		Waco-Temple-Bryan	TX	286,300	7	1	8	2	6
95		Johnstown-Altoona	PA	286,070	6	1	7	1	6
96		El Paso	TX	276,980	10	1	11	0	11
97		Baton Rouge	LA	276,130	4	1	5	0	5
98		Evansville	IN	274,660	5	1	6	0	6
99		Youngstown	OH	272,990	3	1	4	0	4
100		Savannah	GA	261,830	5	1	6	0	6
101		Lincoln & Hstngs-Krny Plus	NE	260,190	10	1	11	5	6
102		Harlingen-Wslco-Brnsvl-McA	TX	254,460	5	1	6	0	6
103		Ft. Wayne	IN	249,350	5	1	6	0	6
104		Charleston, SC	SC	243,230	5	1	6	0	6
105		Springfield-Holyoke	MA	242,450	2	1	3	0	3
106		Greenville-New Bern-Wash	NC	241,040	5	1	6	1	5
107		Lansing	MI	237,860	4	1	5	0	5
108		Tyler-Longview(Lfkn&Ncgd)	TX	236,760	5	1	6	2	4
109		Tallahassee-Thomasville	FL	230,300	5	1	6	0	6
110		Peoria-Bloomington	IL	229,770	4	1	5	0	5
111		Reno	NV	228,880	6	1	7	0	7
112		Monterey-Salinas	CA	228,630	4	1	5	0	5
113		SantaBarbra-SanMar-SanLuOb	CA	228,350	3	1	4	0	4
114		Souix Falls et al SD Total	SD	228,260	9	1	10	5	5
115		Augusta	GA	228,240	4	1	5	0	5
116		Florence-Myrtle Beach	SC	227,520	4	1	5	0	5
117		Montgomery	AL	226,810	5	1	6	0	6
118		Ft. Smith - Fayetteville	AR	221,740	6	1	7	2	5
119		Fargo-Valley City	ND	220,200	8	1	11	4	7
120		Traverse City-Cadillac	MI	219,500	8	1	9	4	5
121		Macon	GA	210,460	5	1	6	0	6

# Local Satellite Service by DMA Market by Rank

MKT #	Launched/Announced Market	DMA Name	State	Total 1999 TV HH	Commercial Stations***	Public/Ed Stations***	Total Stations	Repeated Stations***	Net Stations
122		Eugene	OR	209,790	9	1	10	4	6
123		Lafayette, LA	LA	203,650	3	1	4	0	4
124		Yakima-Pasco-RchInd-Knnwck	WA	199,850	6	1	7	3	4
125		Boise	ID	199,760	5	1	6	0	6
126		Amarillo	TX	191,450	5	1	6	1	5
127		Columbus, GA	GA	186,790	5	1	6	0	6
128		Corpus Christi	TX	184,900	4	1	5	0	5
129		La Crosse-Eau Claire	WI	182,310	6	1	7	2	5
130		Bakersfield	CA	181,660	4	1	5	0	5
131		Chico-Redding	CA	176,610	4	1	5	0	5
132		Columbus-Tupelo-West Point	MS	175,370	3	1	4	0	4
133		Duluth-Superior	MN/WI	175,000	5	1	6	1	5
134		Monroe-El Dorado	AR	173,070	4	1	5	0	5
135		Rockford	IL	170,680	4	1	5	0	5
136		Wausau-Rhineland	WI	165,760	4	1	5	0	5
137		Beaumont-Port Arthur	TX	165,290	3	1	4	0	4
138		Topeka	KS	157,750	3	1	4	0	4
139		Terre Haute	IN	157,200	3	1	4	0	4
140		Wheeling-Steubenville	WV/OH	157,000	2	1	3	0	3
141		Erie	PA	154,550	4	1	5	0	5
142		Medford-Klamath Falls	OR	154,310	6	1	7	2	5
143		Wichita Falls & Lawton	TX/OK	153,330	4	1	5	0	5
144		Sioux City	IA	150,630	3	1	4	0	4
145		Columbia-Jefferson City	MO	150,220	4	1	5	0	5
146		Lubbock	TX	147,570	5	1	6	0	6
147		Joplin-Pittsburg	MO	147,330	3	1	4	0	4
148		Bluefield-Beckley-Oak Hill	WV/OH	140,580	3	1	4	0	4
149		Albany, GA	GA	139,280	3	1	4	0	4
150		Odessa-Midland	TX	138,510	6	1	7	1	6
151		Wilmington	NC	138,120	3	1	4	0	4
152		Minot-Bismarck-Dickinson	ND	137,220	10	1	14	7	7
153		Rochestr-Mason City-Austin	IA	132,120	4	1	5	1	4
154		Binghamton	NY	129,100	3	1	4	0	4
155		Anchorage	AK	128,280	6	1	7	0	7
156		Bangor	ME	128,140	3	1	4	0	4
157		Panama City	FL	122,790	4	1	5	0	5
158		Biloxi-Gulfport	MS	117,040	2	1	3	0	3
159		Palm Springs	CA	115,070	2	1	3	0	3
160		Sherman-Ada	TX/OK	113,640	2	1	3	0	3
161		Quincy-Hannibal-Keokuk	IL/MO/IA	110,740	3	1	4	0	4
162		Salisbury	MD	109,740	2	1	3	0	3
163		Abilene-Sweetwater	TX	109,690	4	1	5	0	5

# Local Satellite Service by DMA Market by Rank

MKT #	Launched/Announced Market	DMA Name	State	Total 1999 TV HH	Commercial Stations***	Public/Ed Stations***	Total Stations	Repeated Stations***	Net Stations
164		Clarksburg-Weston	WV	106,140	3	1	4	0	4
165		Gainesville	FL	104,170	1	1	2	0	2
166		Idaho Falls-Pocatello	ID	103,840	3	1	4	0	4
167		Hattiesburg-Laurel	MS	99,220	2	1	3	1	2
168		Utica	NY	97,270	3	1	4	0	4
169		Billings	MT	95,010	5	1	6	0	6
170		Elmira	NY	92,370	3	1	4	0	4
171		Missoula	MT	91,330	4	1	5	1	4
172		Dothan	AL	91,320	3	1	4	0	4
173		Lake Charles	LA	88,160	2	1	3	0	3
174		Yuma-El Centro	AZ	86,960	5	1	6	0	6
175		Rapid City	SD	85,950	6	1	7	3	4
176		Watertown	NY	84,730	2	1	3	0	3
177		Alexandria	LA	82,740	2	1	3	0	3
178		Jonesboro	AR	82,500	1	1	2	0	2
179		Marquette	MI	81,770	4	1	5	1	4
180		Harrisonburg	VA	77,850	1	1	2	0	2
181		Greenwood-Greenville	MS	76,320	2	1	3	0	3
182		Bowling Green	KY	75,560	2	1	3	0	3
183		Meridian	MS	68,100	3	1	4	0	4
184		Jackson	TN	63,840	2	1	3	1	2
185		Parkersburg	WV	61,960	1	1	2	0	2
186		Great Falls	MT	60,880	3	1	4	0	4
187		Grand Junction-Montrose	CO	59,210	4	1	5	1	4
188		Twin Falls	ID	56,850	2	1	3	0	3
189		Eureka	CA	56,650	4	1	5	2	3
190		Butte-Bozeman, MT	MT	54,600	4	1	5	1	4
191		Laredo	TX	54,540	4	1	5	1	4
192		St. Joseph	MO	53,780	2	1	3	0	3
193		Charlottesville	VA	52,840	1	1	2	0	2
194		Lafayette, IN	IN	52,170	1	1	2	0	2
195		Mankato	MN	52,000	1	1	2	0	2
196		San Angelo	TX	51,460	3	1	4	1	3
197		Cheyenne, WY-Scottsbluff, NE	WY/NE	50,020	5	1	6	3	3
198		Ottumwa-Kirkville	IA/MO	48,680	2	1	3	0	3
199		Casper-Riverton	WY	48,280	5	1	6	2	4
200		Bend, OR	OR	41,950	1	1	2	0	2
201		Lima	OH	38,060	2	1	3	0	3
203		Fairbanks	AK	30,700	4	1	5	1	4
204		Victoria	TX	29,720	2	1	3	0	3
205		Presque Isle	ME	27,580	1	1	2	0	2
206		Juneau	AK	23,930	1	1	2	0	2

## Local Satellite Service by DMA Market by Rank

MKT #	Launched/Announced Market	DMA Name	State	Total 1999 TV HH	Commercial Stations***	Public/Ed Stations***	Total Stations	Repeated Stations***	Net Stations
207		Helena	MT	20,940	1	1	2	0	2
208		Alpena	MI	16,530	1	1	2	0	2
209		North Platte	NE	14,550	1	1	2	0	2
210		Glendive	MT	3,900	1	1	2	0	2
<b>TOTAL 65-210 MARKETS</b>				<b>26,029,610</b>	<b>601</b>	<b>144</b>	<b>753</b>	<b>88</b>	<b>665</b>
<b>% TO OVERALL TOTAL</b>				<b>25.83%</b>	<b>50.00%</b>	<b>68.90%</b>	<b>52.88%</b>	<b>72.73%</b>	<b>51.04%</b>
<b>OVERALL TOTAL</b>				<b>100,769,880</b>	<b>1,202</b>	<b>209</b>	<b>1,424</b>	<b>121</b>	<b>1,303</b>